

EXHIBIT A

Local 7.1 Meet and Confer: Seeking Concurrence or Opposition on Motion for Issuance of Summons onto Defendants

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To:Gutierrez, Michael <gutierrez@butzel.com>;Burk, Tyler A. <burkt@butzel.com>;Hatch, Daniel <hatchd@butzel.com>

All,

As you are aware, following Chief Judge Hala Y. Jarbou's Order vacating Magistrate Berens' Order that struck my First Amended Complaint, the FAC is now the operative complaint in this matter. The FAC also added three new named defendants: Thomas C. Walker, William Henn, and Andrew Cascini.

Today, my attempt to submit proposed summons for the new defendants was denied, with the reason being that my FAC "has not yet been restored to the public docket pursuant to Order [45]."

Chief Judge Jarbou's Order granted my appeal and vacated Magistrate Berens' Order as contrary to law, thereby clearly establishing the FAC as the operative complaint. The Order allows for additional briefing before the FAC is restored to the public docket, but this does not negate the fact that the FAC is the operative complaint, and thus, the new defendants need to be served without delay.

Proceeding without serving these new defendants is not only prejudicial to myself and the new defendants but will also lead to fragmented litigation, repetitive motions, and duplicative hearings, wasting both judicial resources and the parties' time.

Thus, it is necessary for the integrity and efficiency of the case that all named defendants be served and participate in the proceedings from the outset.

To address this issue, I intend to file a motion requesting the Court to:

1. Direct the Clerk of Court to issue summons for the new defendants named in the FAC.
2. Adjust all proceedings, except possibly the motion for recusal, until the new defendants have been served and can participate in the litigation.

Please let me know at your earliest convenience whether you will concur with this motion or if you intend to oppose it.

Thank you,

Brittany E. Martin